

AFFIDAVIT OF DONNA JEFFERYS

STATE OF WEST VIRGINA

COUNTY OF PRESTON


I, DONNA JEFFERYS, do hereby affirm under the penalties of perjury, that the matters set forth below are true.

1. I am over the age of eighteen (18), and I am competent to be a witness in this action, and have personal knowledge of the matters and facts set forth herein.
2. I served as the Executive Office Coordinator to the Baptist Convention of Maryland/Delaware (BCMD) from November 2014 through June 2017, which included the parts of the tenures of Executive Directors Dr. McRaney, Interim Rev. Tom Stolle, Rev. Rick Hancock, and Rev. Kevin Smith. Dr. McRaney served as the Executive Director of the BCMD from Oct. 1, 2013 through June 8, 2015.
3. In August 2015, Interim Executive Director Stolle told me in the BCMD office building that Dr. McRaney threatened BCMD attorney Jeff Agnor during a visit by he and Mrs. Sandy McRaney's to Agnor's office on August 3, 2015.
4. I responded to Stolle that I had not ever witnessed anything in Dr. McRaney that would indicate his capacity to threaten someone, let alone an attorney. Furthermore, if that had occurred, his wife Sandy would have immediately stopped him. Stolle reinforced his statement that in fact Dr. McRaney did threaten the BCMD's attorney and that I needed to trust him.
5. In subsequent conversations, Stolle also told me that other BCMD staff members were afraid of Dr. McRaney. I inquired of each onsite staff member in the building after Stolle's comments. Each staff member indicated they were not afraid and did not feel threatened by Dr. McRaney, contrary to Stolle's assertion.
6. In future conversations with Stolle, he verbally communicated to me a need to hire an armed guard to protect the staff and/or persons in various BCMD meetings from Dr. McRaney, communicating that if Dr. McRaney would threaten an attorney, he posed a physical risk to our staff and Board members.
7. Subsequently Stolle hired three different individuals armed guards over the coming months, including a former Sheriff's Deputy and current Maryland minister who serves as the Blue Ridge Baptist Association Director of Missions Rev. Bruce Conley to be an armed guard.
8. During my 15 years of employment with the BCMD, to my knowledge not once had the Convention secured a guard for a meeting, armed or unarmed.
9. During a recent phone conversation with Dr. McRaney on Saturday, May 3, 2019 I informed Dr. McRaney that BCMD Chief Financial Officer/Associate Executive Director Stolle told me in a conversation that he (Dr. McRaney) had personally threatened the


BCMD Attorney Jeff Agnor in August 2015 and some of the surrounding conversations and details.

10. This Affidavit is given for use as evidence in any mediation or legal action.

This the 8 day of May, 2019.


DONNA JEFFERYS

SWORN TO AND SUBSCRIBED BEFORE ME, this the 8th day of May, 2019.


NOTARY PUBLIC

My Commission Expires: 03-24-2022

(SEAL)

